

WASHINGTON ASSOCIATION OF SHERIFFS & POLICE CHIEFS

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Serving the Law Enforcement Community & the Citizens of Washington

April 24, 2006

To Whom It May Concern,



Please accept this letter in support of efforts by the PH:ARM Project (Pharmaceuticals from Households: A Return Mechanism). As you likely know, this group represents a broad coalition of government agencies and other stakeholders who have spent considerable time designing a pioneering safe and secure yet practical pilot program to capture unwanted medications from households and residents of nursing homes.

While the environmental and public health impacts of disposed pharmaceuticals are still coming into sharper focus as an emerging environmental pollutant, local jurisdictions responsible for public health and environmental protection are under increasing pressure to prevent potentially harmful disposal, illegal diversion and accidental poisonings. Currently there is no legal or practical method to meet all three of these concerns. The members of WASPC share these concerns, particularly in the context of our stated mission to enhance public safety.

The Washington Association of Sheriffs and Police Chiefs (WASPC) already faces considerable challenges in the management of evidentiary drugs. Nationally, the DEA has allowed collection of controlled pharmaceuticals ONLY with the presence of law enforcement. Law enforcement's burden of being required to play an active role in the management of waste medications from households and residents in nursing homes is not manageable or cost effective.

While the DEA interpretation of the Controlled Substances Act requires the presence of law enforcement officials at pharmaceutical take-back programs, (as currently implemented in a number of east coast pilots), we firmly believe that this is not a long term, broadly applicable solution for capturing significant volumes of unwanted medications. PH:ARM's proposed pilot model is safe, practical, realistic and feasible. We are willing to participate in its implementation to assure necessary measures are taken to prevent diversion and to preserve public safety. We encourage you to grant any necessary waivers or other policy instruments necessary to allow the proposed pilot to begin. We will all gain valuable lessons from its implementation.

Please do not hesitate to contact me should you have any questions 360.486.2380 or dpierce@waspc.org.

Sincerely,

Donald G. Pierce
Executive Director

PH: ARMsupportletter04.24.06

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